

TM:AB
F.#2008R01798

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- against -

JOSEPH TALAMINI,

Defendant.

I N D I C T M E N T

Cr. No. _____
(T. 18, U.S.C., §§
1341, 1349, 2 and
3551 et seq.)

- - - - - X

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless
otherwise indicated:

THE DEFENDANT AND RELATED COMPANIES

1. The defendant JOSEPH TALAMINI was the Chief
Executive Officer of V & J Consultants Ltd., located at 900 South
Avenue, Staten Island, New York. V & J Consultants Ltd. was a
mortgage brokerage.

2. Bridge Capital & Associates, Inc. ("Bridge
Capital") was incorporated on or about January 28, 2004. Bridge
Capital was a mortgage brokerage. On its U.S. Income Tax Return
for an S Corporation, Form 1120S, for tax year 2004, Bridge
Capital did not list any salaries or wages for employees.

3. The defendant JOSEPH TALAMINI was a 50%
shareholder of Bridge Capital in tax year 2004.

THE FRAUDULENT SCHEME

4. On or about and between March 30, 2005 and April 13, 2005, both dates being approximate and inclusive, the defendant JOSEPH TALAMINI, together with others, devised and engaged in a scheme to defraud banks and other lenders by obtaining mortgage loans through fraudulent means. It was a part of the scheme that the defendant JOSEPH TALAMINI and his co-conspirators submitted a false verification of employment for an applicant seeking a home mortgage loan from Encore Credit Corporation d/b/a ECC Encore Credit ("Encore Credit") stating that the applicant worked as a financial consultant at Bridge Capital, 613 Midland Avenue, Staten Island, New York and began employment on March 22, 2003. The verification of employment was purportedly signed by TALAMINI, who was identified as the owner. It was a further part of the scheme that documents submitted by TALAMINI and others in support of the home mortgage loan application falsely represented the applicant's employment and income in order to make the applicant appear more creditworthy.

COUNT ONE

(Conspiracy to Commit Mail Fraud)

5. The allegations contained in paragraphs 1 through 4 are repeated and incorporated as though fully set forth in this paragraph.

6. On or about and between March 30, 2005 and April 13, 2005, both dates being approximate and inclusive, within the

Eastern District of New York and elsewhere, the defendant JOSEPH TALAMINI, together with others, did knowingly and intentionally conspire to execute a scheme and artifice to defraud Encore Credit and to obtain money and property from Encore Credit by means of materially false and fraudulent pretenses, representations and promises and, for the purpose of executing such scheme and artifice, did cause mail matter to be delivered by a private and commercial interstate carrier according to the directions thereon, contrary to Title 18, United States Code, Section 1341.

(Title 18, United States Code, Sections 1349 and 3551 et seq.)

COUNT TWO
(Mail Fraud)

7. The allegations contained in paragraphs 1 through 4 are repeated and incorporated as though fully set forth in this paragraph.

8. On or about and between March 30, 2005 and April 13, 2005, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JOSEPH TALAMINI, together with others, did knowingly and intentionally devise a scheme and artifice to defraud Encore Credit and to obtain money and property from Encore Credit by means of materially false and fraudulent pretenses, representations and promises and, for the purpose of executing such scheme and

artifice, did cause mail matter to be delivered by a private and commercial interstate carrier, according to the directions thereon.

(Title 18, United States Code, Sections 1341, 2 and 3551 et seq.)

A TRUE BILL


FOREPERSON


BENTON J. CAMPBELL
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

JOSEPH TALAMINI,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 1341, 1349, 2 and 3551 et seq.)

A true bill,

William Weber

Foreman

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

Amy Busa, Assistant U.S. Attorney (718-254-6274)

INFORMATION SHEET

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

1. Title of Case: United States v. Joseph Talamini
2. Related Magistrate Docket Number(s): _____
None (X)
3. Arrest Date: _____
4. Nature of offense(s): ☒ Felony
☐ Misdemeanor
5. Related Cases - Title and Docket Nos. (Pursuant to Rule 50.3 of the
Local E.D.N.Y. Division of Business Rules):

6. Projected Length of Trial: Less than 6 weeks (X)
More than 6 weeks ()
7. County in which crime was allegedly committed: Staten Island
(Pursuant to Rule 50.1(d) of the Local E.D.N.Y. Division of Business Rules)
8. Has this indictment been ordered sealed? (X) Yes () No
9. Have arrest warrants been ordered? (X) Yes () No
10. Capital count included? () Yes (X) No

BENTON J. CAMPBELL
UNITED STATES ATTORNEY

By: _____

Amy Busa
Assistant U.S. Attorney
(718) 254-6274